

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO 04-

HEIDI K. ERICKSON  
Plaintiff

2004 JUL 19 P 4:32

v.

U.S. DISTRICT COURT  
DISTRICT OF MASS. PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTSCOMMONWEALTH OF MASSACHUSETTS  
MITT ROMNEY, et al  
Defendant

The Plaintiff Ms. Heidi K. Erickson submits upon Defendant Massachusetts Department of Agricultural Resources (MDA) her request herein of the Defendant MDA under the F. R. C. P. for the production of documents listed hereinbelow and that the Defendant MDA produce the copies of all the herein requested documents described within 30 days to Heidi K. Erickson Box 0444, Cambridge, MA 02238 on or before 8/19/04.

This request is intended to cover all records and documents in the possession currently or previously in the possession of the Defendant MDA or subject to their custody and control, whether they are located at the MDA's principle or secondary place of business, their principal or secondary place of organization, at the office of the attorney general, the office of any accountant or any other place or in the possession of any other person with said records and documents being subject to the MDA's control.

As used herein, the terms "MDA" "you", "your", or "yourself" refer to the Massachusetts Department of Agricultural Resources, each of its, employees, agents, representatives, and attorneys, and each person acting or purporting to act on its behalf.

As used herein, the term "representative" means any and all employees, commissioners, agents, servants, officers, directors, attorneys, or other persons acting or purporting to act on its behalf.

As used herein, the term "communication" means any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to: email, written correspondence, conversations, dialogues, discussions, interviews, consultations, agreements, records, notes and other understanding between or among two or more persons or those understandings that were reduced to writing and or any understanding, record or documentation.

1. Please provide all quarantine laws, regulations, and policy.
2. Please provide all documents and 'communications' regarding Ms. Erickson's Persians, prior to the quarantine issued in June 2003 for her Persians held at ARL 599 Washington Street, Pembroke and all the same acquired after the issuance of said quarantine.

3. Please provide a copy of all quarantines that have been transferred, or lifted temporarily and reissued on approximately the same animal(s) but at a different location.
4. Please provide a copy of all quarantines and related communication and records on cats for ringworm issued over the last 5 years.
5. Please provide all communications, and reports of inspections of the ARL at 599 Washington Street in Pembroke, MA

Respectfully submitted by

Heidi K. Erickson, pro se  
July 19<sup>th</sup>, 2004

